

REMARKS

Claims 1 - 21 are in the application and are presented for consideration. By this Amendment, Applicant has made minor formal changes to each of the independent claims. Clarifying changes have also been made to claims 4 and 5.

Claims 1 - 20 have been rejected under 35 USC § 112, second paragraph, as being indefinite.

Applicant has now revised each of the independent claims to clarify the reference to the "parting plane". It is Applicant's position that these claims are now clear and definite.

Claim 6 has been amended to remove the reference to the narrow limitation within the broader range. The narrow limitation is now presented as new claim 21. Applicant attaches a credit card payment form for the fee for the one extra dependent claim.

Claims 4 and 5 have been rejected as being anticipated by Cattoi.

Applicant has now clarified claim 4 to more clearly highlight the important combination of features of the invention. Applicant's tool includes a basic body and clamping jaw with each having a groove (receiving groove and clamping groove respectively) which cooperate to form a clamping channel. The adjacent surfaces form a parting plane as described. A pressing spindle is arranged coaxially with the clamping channel. Flanging pressure piece is also provided.

The receiving groove and clamping groove have groove sections with one of semi-cylindrical and semi-elliptical smooth surfaces with these groove sections alternating in an axial

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direction between greater and lesser groove depths. However each of the groove sections have a width that is constant, namely corresponding to the external diameter of the brake pipe to be flanged. This combination of features is neither taught nor suggested by the prior art as a whole. With the invention the surfaces of the groove sections are smooth and are not roughened. The depth of the successive groove sections is different but the width of the different groove sections is identical. This presents a sickle-shaped step formed between successive groove sections. This is not a surface roughness feature but an alternating dimension. This can be appreciated from the specification as a whole but is emphasized with the attached drawings. Specifically Exhibit A presents an enlargement of Fig. 7. It can be seen that the width B2 of the groove section of greater depth T2 is the same as the width B3 of the grooved section of the lesser depth. This can be appreciated from the text in the specification. This difference of the depths T2 and T3 is now clearly highlighted in claim 4 and the prior art as a whole fails to teach or suggest this combination of features. The depth T2 is greater than the depth T3 in this situation. Since the difference between T2 and T3 should be 0.1mm at most, this feature is not perceivable in the drawings but is described with reference to the drawings in particular. Exhibit B shows another view. In the view of Exhibit B, the differences of the depth of the groove section 16 and the groove section 70 from Fig. 7 of the original drawing are shown in a more exaggerated or extreme manner. This view likewise shows a section 7-7 from the original drawing Fig. 4. It can be seen that the depth of groove section 70 is considerably smaller than the depth of groove section 60. With this exaggeration, the shaded area ST is visible which is designed as a sickle-shaped region. This shaded area represents the

shape of the step between successive groove sections of the greater dimension. Given the small nature of this change, only this exaggerated example presents this showing. However, this presents a much different approach as compared to a roughened section as per the prior art. The prior art as a whole clearly fails to provide any teaching or suggestion of providing the combination of features claimed. The features claimed are clearly not recognizable in Cattoi. Only "furrows" or a rough surface are discussed in Cattoi. Furrows are shown in Fig. 4 in Cattoi as threaded sections, such that these form edges sharply directed inwardly. Precisely such edges directed sharply inwardly, such as threaded sections, are not present in the subject as claimed in claim 4. As such, Cattoi directs the person of ordinary skill in the art away from the combinations claimed.

Claim 5 has been clarified where it can be appreciated that the semi-cylindrical or semi-elliptical groove sections of different depths of the alternating grooves lie opposite one another, such that the deeper grooves are always assigned to one another and the grooves of lesser depth also lie opposite one another.

As noted, the prior art as a whole fails to teach and fails to suggest the combination of features claimed. Applicant has already provided comments as to prior art cited with Applicant's Information Disclosure Statements. Applicant's comments as to the other prior art references as follows:

U.S. 1,372,197 discloses a tube flaring apparatus. The reference does not teach the combination of features as claimed in the independent claims including the basic body, the clamping jaw, the pressing spindle and the flanging pressure piece as claimed. The reference

is believed to be technological background.

U.S. 1,754,637 discloses a pipe flanging tool with segments such as segment 11 which are part of a dye and cooperate with circular segment 15. The reference fails to teach and fails to suggest the combination of features as claimed including the basic body, the clamping jaw, the pressing spindle and the flanging pressure piece as claimed.

U.S. 2,555,591 discloses a pipe coupling structure with segment pieces. The interior of the segment pieces include segments for shoes with threads 55 for gripping metal pipes. The reference fails to teach the combination of features as highlighted in the independent claims, namely the basic body, the clamping jaw, the pressing spindle and the flanging pressure piece with the features as specified.

U.S. 3,038,490 discloses a piercing valve with posed top and bottom surfaces 63, 64 that grab a pipe structure. The bottom part 2 has a saddle 35 with depressions of various arcuate shapes for receiving different sized pipes. The reference fails to teach the combination of features as claimed in the independent claims.


U.S. 4,104,902 (Cease) discloses a farrow forming assembly. This structure provides an inner tube with threaded sections. This reference fails to teach and suggest the combination of features as claimed in the independent claims.

As all claims now presented highlight a combination of features neither taught nor suggested by the prior art, it is requested that all claims be favorably considered. Should the Examiner determine that issues remain which have not been resolved by this response, the

Examiner is requested to telephone Applicant's attorney at the number given below.

Respectfully submitted
for Applicant,

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Enclosed: Exhibit A and Exhibit B

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